

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

CHARLES BOYLE,	)	
	)	
Plaintiff,	)	
	)	
v.	)	NO. 09 CV 1080
	)	
University of Chicago Police Officer	)	JUDGE BUCKLO
LARRY TORRES, Star # 1028,	)	MAGISTRATE JUDGE DENLOW
University of Chicago Police Officer	)	
CLARENCE E. MOORE, Star #1012,	)	
University of Chicago Police Officer	)	
GALARZA, University of Chicago Police	)	
Officer KWIATKOWSKI, University of	)	
Chicago Police Officer GILLESPIE,	)	
UNIVERSITY OF CHICAGO, Chicago	)	
Police Officer V. DARLING, Star #19135,	)	
Chicago Police Officer C. E. MARTIN,	)	
Star #17246, and the CITY OF CHICAGO,	)	
	)	
Defendants.	)	

**AGREED MOTION FOR ENTRY OF A PROTECTIVE ORDER**

Defendants, Chicago Police Officers Darling and Martin, (collectively, “Defendant Officers”), by and through their attorney, Helen C. Gibbons, Assistant Corporation Counsel of the City of Chicago, move this Court pursuant to Fed.R.Civ.P. 26(c), for entry of a protective order.

In support of this motion, the Defendant Officers state as follows:

1. Documents pertaining to the parties and non-parties will be sought and produced in this matter, including the production of personnel files and information such as disciplinary histories, Complaint Registers, and confidential information regarding third-parties. Complaint Registers contain personal information regarding party and non-party police officers including,

but not limited to, personnel files and information, disciplinary documents, personal identifiers of officers and their families, and financial information. Complaint Registers also commonly contain personal identifiers of non-party civilian witnesses. Complaint Registers may also include medical information protected by federal law.

2. Personnel files, disciplinary histories and related information are protected by several state statutes, including the Illinois Personnel Records Review Act, 820 ILCS 40/0.01 *et seq.*, which protects the disclosure of employee personnel files, disciplinary histories and related information and Section 7 of the Illinois Freedom of Information Act, 5 ILCS 140/7, which exempts from disclosure personnel files and documents appropriately contained in personnel files, including disciplinary records.

3. The Defendant Officers' proposed Protective Order would govern the discovery stage of this litigation and would prohibit the use of the specifically identified confidential information for any purpose other than the litigation of this case. The order would further prohibit the dissemination of this specifically identified material and information contained therein to parties outside this litigation, and requires their return to the producing party or their destruction at the conclusion of this litigation. Such an order would ensure the protection of such information, consistent with the principles of federal and Illinois law and protect against unfairness in the trial process.

4. For the foregoing reasons, good cause is established for entry of the proposed protective order.

5. Plaintiff's counsel consents to this motion.

**WHEREFORE**, the Defendant Officers request that this Court enter the Protective Order,  
which will be submitted to the Court separately via electronic mail.

Respectfully submitted,

BY: /s/ Helen C. Gibbons  
HELEN C. GIBBONS  
Assistant Corporation Counsel

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**CERTIFICATE OF SERVICE**

I hereby certify that I have caused true and correct copies of the above and foregoing Motion and Notice of Motion to be served upon all parties of record pursuant to ECF, in accordance with the rules of electronic filing of documents, on this 29th day of July, 2009.

/s/ Helen C. Gibbons  
HELEN C. GIBBONS